

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No.
)	
v.)	Violation:
)	
GAURANG CONTRACTOR,)	<u>Count One:</u> Conspiracy to Commit Wire Fraud
)	(18 U.S.C. § 1349)
)	
Defendant)	<u>Forfeiture Allegation</u>
)	(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C.
)	§ 2461(c))

INDICTMENT

At all times relevant to this Indictment:

General Allegations

1. GAURANG CONTRACTOR was a resident of Jersey City, New Jersey.
2. Victim 1 was a resident of Athol, Massachusetts.

Overview of the Conspiracy and the Scheme to Defraud

3. Beginning on or about August 3, 2022, and continuing until on or about August 8, 2022, defendant CONTRACTOR and others devised, and intended to devise, a scheme and artifice to defraud and to obtain money and other property by means of materially false and fraudulent pretenses, representations and promises, in violation of 18 U.S.C. §§ 1343 and 1349.

Object and Purpose of the Conspiracy

4. The object of the conspiracy was to commit wire fraud. The principal purpose of the conspiracy and the scheme to defraud was to deprive Victim 1 of property in the form of U.S. currency and gold valued at approximately \$300,000.

Manner and Means of the Conspiracy and Scheme to Defraud

5. Among the manner and means by which CONTRACTOR and his coconspirators known and unknown to the Grand Jury carried out the conspiracy and the scheme to defraud were the following:

- a. CONTRACTOR's co-conspirator contacted Victim 1 by telephone and pose as a "Oscar WHITE," a United States Drug Enforcement Administration (DEA) agent, who Victim 1 perceived to be in a position of power and authority;
- b. The individual posing as "Oscar WHITE" lied to Victim 1, falsely stating that Victim 1's bank accounts had been compromised by drug traffickers;
- c. The individual posing as "Oscar WHITE" directed Victim 1 to consolidate Victim 1's funds into a single checking account and then use those funds to purchase a significant quantity of gold;
- d. "Oscar WHITE" then directed Victim 1 to leave the gold in an unlocked vehicle for a "court officer" to retrieve for safekeeping; and
- e. CONTRACTOR attempted to retrieve the gold and deprive Victim 1 of Victim 1's property.

Overt Acts in Furtherance of the Conspiracy and the Scheme to Defraud

6. In furtherance of the conspiracy and to accomplish the object of the conspiracy, CONTRACTOR and his co-conspirators committed and caused to be committed the following overt acts, in the District of Massachusetts and elsewhere:

- a. On or about August 3, 2022, a co-conspirator, posing as DEA Agent "Oscar WHITE," falsely told Victim 1 during a telephone call that criminals were using Victim 1's identity to launder money through Victim 1's bank accounts;
- b. Between August 3, 2022 and August 5, 2022, a co-conspirator, posing as DEA Agent "Oscar WHITE," sent Victim 1 a photograph via text message of a man's face affixed on an identification or credential that "Oscar WHITE" falsely claimed was his DEA identification;

- c. Between August 3, 2022 and August 5, 2022, “Oscar WHITE” provided Victim 1 with the name of a jewelry store in Hadley, Massachusetts at which Victim 1 could purchase a significant quantity of gold;
- d. Between August 3, 2022 and August 6, 2022, “Oscar WHITE” told Victim 1 that he would send a “court officer” to Massachusetts to retrieve the gold from Victim 1;
- e. On or about August 6, 2022, “Oscar WHITE” instructed Victim 1 to send photograph of her vehicle via text message;
- f. Between August 3, 2022 and August 6, 2022, “Oscar WHITE” instructed Victim 1 to leave the gold that she acquired from the jewelry store in her vehicle and to leave the vehicle unlocked.
- g. Between August 6, 2022 and August 8, 2022, “Oscar WHITE” told Victim 1 that the “court officer” would meet her in Hadley, Massachusetts to retrieve the gold for safekeeping;
- h. On or about August 8, 2022, CONTRACTOR drove from New Jersey to Hadley, Massachusetts for the purpose of retrieving the gold that Victim 1 purchased at the direction of “Oscar WHITE;”
- i. On or about August 8, 2022, CONTRACTOR conducted surveillance of the jewelry store in Hadley, Massachusetts at which Victim 1 had purchased the gold at the direction of “Oscar WHITE;”
- j. On or about August 8, 2022, CONTRACTOR followed a vehicle from the jewelry store to the restaurant; and
- k. On or about August 8, 2022, in Hadley, Massachusetts, CONTRACTOR removed two buckets containing what he believed to be Victim 1’s gold from an unlocked vehicle and placed those two buckets into his own vehicle.

COUNT ONE
Conspiracy to Commit Wire Fraud
(18 U.S.C. § 1349)

The Grand Jury charges:

7. The Grand Jury re-alleges and incorporates by reference paragraphs 1-6 of this Indictment.

8. Beginning, at least, on or about August 3, 2022, and continuing until on or about August 8, 2022, in the District of Massachusetts, and elsewhere, the defendant,

GAURANG CONTRACTOR,

conspired with others known and unknown to the Grand Jury to commit the following offense: wire fraud, that is, having devised and intending to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, did transmit and cause to be transmitted, by means of wire communications in interstate and foreign commerce, writings, signs, signals, pictures and sounds, for the purpose of executing the scheme to defraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

9. Upon conviction of conviction of the offense alleged in Count One, in violation of Title 18, United States Code, Section 1349, the defendant,

GAURANG CONTRACTOR,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

10. If any of the property described in Paragraph 9, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 9 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL


FOREPERSON



DANIAL E. BENNETT
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: December 8th, 2022
Returned into the District Court by the Grand Jurors and filed.

 3:30pm
DEPUTY CLERK